

EXHIBIT G

REDACTED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.;

3:17-cv-00939-WHA

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

-----/

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF JEFF HOLDEN

SAN FRANCISCO, CALIFORNIA

TUESDAY, AUGUST 15, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2660984

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Page 1

1 Q [REDACTED] 15:44

2 A [REDACTED] 15:44

3 [REDACTED] 15:44

4 Q If you'd turn to page 3 of Exhibit 804. 15:44

5 A (Witness complies.) 15:44

6 Okay. 15:45

7 Q Row 45 in the -- lists you as a recipient, 15:45

8 and then the "Subjects Discussed" says it's: 15:45

9 [REDACTED] 15:45

10 [REDACTED] 15:45

11 [REDACTED] 15:45

12 Do you see that? 15:45

13 A I do. 15:45

14 Q Do you recall if you attended [REDACTED] 15:45

15 [REDACTED] 15:45

16 A I don't. I mean, it seems like we looked at 15:45

17 meeting invites and e-mails around those dates. [REDACTED] 15:45

18 [REDACTED] 15:45

19 [REDACTED] 15:45

20 Q Other than what's summarized in e-mails, do 15:45

21 you have any recollection of what was discussed at any 15:45

22 meetings on or about those dates? 15:45

23 A No. 15:45

24 Q If you'll look down at row 4 -- 46. 15:45

25 A Yes. 15:46

1 Q It lists you as a recipient of an e-mail, and 15:46

2 the "Subject Discussed" is: 15:46

3 [REDACTED] 15:46

4 [REDACTED] 15:46

5 Do you see that? 15:46

6 A I do. 15:46

7 Q Do you remember attending [REDACTED] 15:46

8 [REDACTED] 15:46

9 [REDACTED] 15:46

10 A Not in a -- not in a particular meeting. 15:46

11 Q Do you recall anything specific that was 15:46

12 discussed with Mr. Levandowski regarding [REDACTED] 15:46

13 [REDACTED] 15:46

14 A There is the one -- there's the one e-mail 15:46

15 that I sent that summarized the meeting. This is -- 15:46

16 this is based on what you showed me, so I don't -- I 15:46

17 mean, it's just that this is the only thing I 15:46

18 remember, which, you know, said that I had laid out 15:46

19 some initial high-level milestones. But that's the 15:46

20 only -- I only remember that because you showed it to 15:46

21 me. I don't remember anything else specific. 15:46

22 Q Other than what's summarized in the e-mail, 15:46

23 do you have any independent recollection of 15:46

24 discussions of those milestones? 15:46

25 A No, I don't. 15:46

1 Q If you'll look down to row 54. 15:46

2 A Okay. 15:47

3 Q It describes an e-mail discussing a 15:47

4 January 20th, 2016, meeting with Mr. Levandowski. 15:47

5 Do you see that? 15:47

6 A I do. 15:47

7 Q Do you recall if you participated in that 15:47

8 meeting? 15:47

9 A I don't. 15:47

10 Q So, is it fair to say you don't recall what 15:47

11 was discussed? 15:47

12 A That's fair, yes. 15:47

13 Q All right. 15:47

14 If you'd turn to the next page, page 4, 15:47

15 row 66. 15:47

16 A Okay. 15:47

17 Q It lists an e-mail regarding: 15:47

18 [REDACTED] 15:47

19 [REDACTED] 15:47

20 And the date here is January 24th, 2016. 15:47

21 Do you recall if you attended the meeting 15:47

22 referenced there? 15:47

23 A I don't recall. 15:47

24 Q Is it fair to say then, you don't recall what 15:48

25 was discussed at that meeting? 15:48

1 A That's fair. 15:48

2 Q If you'll look down to row 69. 15:48

3 A Okay. 15:48

4 Q In the "Subjects Discussed" column, it says: 15:48

5 [REDACTED] 15:48

6 [REDACTED] 15:48

7 [REDACTED] 15:48

8 [REDACTED] 15:48

9 Do you recall if you participated in the 15:48

10 meeting with Mr. Levandowski and Mr. Poetzscher? 15:48

11 A I don't recall. 15:48

12 Q And then -- so is it fair to say you don't 15:48

13 know what was discussed? 15:48

14 A That's fair. 15:48

15 Q And do you recall if you participated in the 15:48

16 phone call between Mr. Levandowski and Mr. Kalanick? 15:48

17 A I don't recall. 15:48

18 Q Do you ever -- do you recall ever being on 15:48

19 any phone calls with just those two? 15:48

20 A No. I mean, I've -- I was in meetings at 15:49

21 various points. I don't know if we were on the phone 15:49

22 or in person, but nothing specific. 15:49

23 Q So, you don't know what was discussed on the 15:49

24 January 25th, 2016, phone call -- 15:49

25 A I don't. 15:49

1 Q -- other than what might be in the summary? 15:49
2 A No. 15:49
3 Q If you'll look down at row 74. 15:49
4 A Okay. 15:49
5 Q It lists: 15:49
6 [REDACTED] 15:49
7 [REDACTED] 15:49
8 [REDACTED] 15:49
9 Do you see that? 15:49
10 A Yes. 15:49
11 Q Did you participate in those meetings? 15:49
12 A I don't remember. 15:49
13 Q So, you don't know what was discussed? 15:49
14 A No. 15:49
15 Q If you'll look down on page 5, and you look 15:50
16 at row 113. 15:50
17 A 113, you said? 15:50
18 Q Yes. 15:50
19 A Okay. 15:50
20 Q This has the date of April 4th, 2016, and it 15:50
21 says: 15:50
22 [REDACTED] 15:50
23 [REDACTED] 15:50
24 Do you see that? 15:50
25 A I do. 15:50

1 Q And I believe we looked earlier at a calendar 15:50
2 invite for that meeting. 15:50
3 [REDACTED] 15:50
4 [REDACTED] 15:50
5 [REDACTED] 15:50
6 A [REDACTED] 15:50
7 Q If you'd turn to the next page, page 6, 15:50
8 row 115. 15:50
9 A Okay. 15:50
10 Q Has the date April 8, 2016, and only your 15:50
11 name is listed there. And the "Subject Discussed" 15:51
12 says: 15:51
13 [REDACTED] 15:51
14 [REDACTED] 15:51
15 Do you see that? 15:51
16 A Yes. 15:51
17 Q Do you recall that discussion? 15:51
18 A No. I'm not really sure this -- are these 15:51
19 all meetings, or what are these entries? 15:51
20 Q I think some are e-mails referencing 15:51
21 meetings. This one says -- if you see the -- the 15:51
22 column "Mode of Communication" -- 15:51
23 A Yeah. 15:51
24 Q -- for this one, the mode of communication is 15:51
25 listed as one-on-one conversation. 15:51

1 A What does that mean? 15:51

2 Q Well, I -- I didn't create this document. 15:51

3 A Okay. 15:51

4 Q So, I don't know. 15:51

5 A I don't know. I have no idea what this is. 15:51

6 Q So, you don't know what meet -- what 15:51

7 one-on-one conversation is being referenced there? 15:51

8 A No. I mean, I don't know if that means, 15:51

9 like, in person, on the phone, if it's just any -- 15:51

10 yeah, I have no idea what that is, because it's 15:51

11 versus, like, e-mail, so -- 15:51

12 Q So -- 15:51

13 A -- it's confusing. 15:51


14 Q Sorry. 15:51

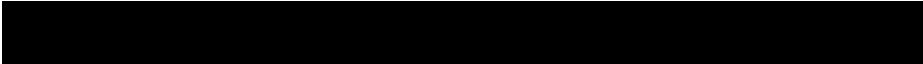
15 So you don't know what was discussed? 15:51

16 A No. 15:51

17 Q If you'll look at row 116, which has the same 15:51

18 date, it says: 15:52

19  15:52

20  15:52

21 Do you see that? 15:52

22 A Yes. 15:52

23 Q Does that appear to be a reference to a 15:52

24 calendar invite for the one-on-one conversation 15:52

25 described in row 115? 15:52

1 A I don't know. 15:52

2 Q Okay. 15:52

3 MR. BRILLE: Object to form. 15:52

4 THE WITNESS: I have no idea. 15:52

5 MS. ROBERTS: Okay. 15:52

6 Q If you'll look down on page 7, row 147. 15:52

7 A (Witness complies.) 15:52

8 Okay. 15:52

9 Q This is dated April 27th, 2016? 15:52

10 A Yeah. 15:52

11 Q The mode of communication is listed as text 15:52

12 message? 15:52

13 A Uh-huh. 15:52

14 Q And the "Subjects Discussed" is: 15:52

15 [REDACTED] 15:52

16 [REDACTED] 15:52

17 Do you see that? 15:52

18 A I do. 15:52

19 Q Do you recall if you participated in the 15:52

20 meeting referenced there? 15:52

21 A I don't. 15:52

22 Q And so you don't recall what was discussed at 15:52

23 that meeting? 15:52

24 A No. 15:53

25 Q If you'd turn to page 8, row 179. 15:53